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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTTHEIRN DISTRICT OF ILLIONIS, EASTERN DIVISION**

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In Re:	)	
	)	
STEVEN A. GRAUNKE	)	
	)	NO. 15 B 04032
	)	
Debtor.	)	
	)	Chapter 13
	)	
	)	
	)	Honorable Judge Jack B. Schmetterer

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**NOTICE OF MOTION**

TO: Tom Vaughn, Chapter 13 Trustee (electronically via ECF)  
All Parties Listed on the Attached Service List (via U.S. Mail)

PLEASE TAKE NOTICE that on September 16, 2015 at 9:30 a.m., the undersigned will appear before the Honorable Judge Jack B. Schmetterer at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Courtroom 682, 219 South Dearborn Street, Chicago, IL 60604 and will then and there present the attached **Motion to Modify Chapter 13 Plan** at which time you may appear if you so choose.

**Certificate of Service**

I, Charles L. Magerski, hereby certify that I caused a copy of this notice to be served, electronically via ECF to Tom Vaughn (Chapter 13 Trustee) and via U.S. Mail to all parties listed on the attached service list, and attached Motion upon the parties on August 25, 2015 before the hour of 5:00 p.m. from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

**BY: /S/ CHARLES L. MAGERSKI**  
**SULAIMAN LAW GROUP, LTD.**  
**COUNSEL FOR DEBTOR(S)**  
900 JORIE BOULEVARD, SUITE 150  
OAK BROOK, IL 60523  
PHONE: (630) 575-8181  
FAX: (630) 575-8188  
ATTORNEY NO: 6297092

**Arrowood Indemnity  
3600 Arco Corporate Drive #600  
Charlotte, NC 28273**

**Arrowood Indemnity  
3600 Arco Corporate Drive  
PO Box 1000  
Charlotte, NC 28201**

**Blatt Hasenmiller F L  
125 S. Wacker Drive #400  
Chicago, IL 60606**

**Blatt, Hasenmiller, Leibsker and Moore,  
10 South LaSalle Street  
Suite 2200  
Chicago, IL 60603**

**Candyce Graunke  
8701 44th Place  
Lyons, IL 60534**

**Capital One Bank  
Po Box 6497  
Sioux Falls, SD 57117**

**Capital One Bank  
Attn: General Correspondence  
Po Box 30285  
Salt Lake City, UT 84130**

**Capital One, N.A. \*  
c/o American Infosource  
P.O Box 54529  
Oklahoma City, OK 73154**

**Cavalry Portfolio Services  
500 Summit Lake Drive  
Valhalla, NY 10595**

**Cavalry SPV I, LLC  
500 Summit Lake Drive Suite 400  
Valhalla, NY 10595**

**Citibank N A  
701 E. 60th Street North  
Sioux Falls, SD 57104**

**Comcast  
2001 York Road  
Oak Brook, IL 60523**

**Convergent Outsourcing, INC  
Po Box 9004  
Renton, WA 98057**

**Department Of Education  
121 S 13th Street  
Lincoln, NE 68508**

**Department of Education  
FedLoan Servicing  
PO Box 530210  
Atlanta, GA 30353**

**Department of Education  
121 S. 13th Street  
Lincoln, NE 68508**

**700 Commerce #500  
Oak Brook, IL 60523**

**Macy's  
9111 Duke Boulevard  
Mason, OH 45040**

**Mcsi Inc  
Po Box 327  
Palos Heights, IL 60463**

**Student Loan Corp  
Po Box 30948  
Salt Lake City, UT 84130**

**The Bureaus Inc.  
Attention: Bankruptcy Department  
1717 Central St.  
Evanston, IL 60201**

**US Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202**

**US Department of Education  
Potomac Center Plaza (PCP)  
550 12th Street, SW  
Washington, DC 20202**

**US Department of Education  
Capitol Place  
555 New Jersey Ave, NW  
Washington, DC 20208**

**US Department of Education  
PO Box 16448  
Saint Paul, MN 55116**

**Village of Lyons  
4200 Lawndale Avenue  
Suite 1  
Lyons, IL 60534**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:	)	
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STEVEN A. GRAUNKE	)	NO. 15 B 04032
	)	
	)	
	)	CHAPTER 13
Debtors.	)	
	)	
	)	HON. JACK B. SCHMETTERER
	)	

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**DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN AND DEFER THE DEFAULT**

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**NOW COMES**, STEVEN A. GRAUNKE (“Debtor”), by and through his attorneys, Sulaiman Law Group, LTD., and pursuant to 11 U.S.C. §1329 bringing this Motion to Modify Chapter 13 Plan, and in support of their motion state as follows:

1. The instant bankruptcy proceeding was filed under Chapter 13 of the Bankruptcy Code on February 6, 2015.
2. This Honorable Court confirmed the Debtor's Modified Plan (“Confirmed Plan”) on August 15, 2015.
3. Debtor's Confirmed Plan required the Debtors to make plan payments to the Chapter 13 Trustee in the amount of \$150.00 per month for 60 months.
4. Debtor's Confirmed Plan is paying 7% to the general unsecured creditors.
5. Since Debtor's Plan was confirmed, the Debtor's plan is now calculating 7% over 83 months.
6. The Debtor still has 53 months left in his Chapter 13 plan and is in a position to increase his monthly payment to complete the plan within 60 months.

7. Specifically, the Debtor will complete his plan if his payment increases \$65.00/month (65.00/53 months) to \$215.00.

8. Debtor respectfully request this Honorable Court to Modify the Debtor's Confirmed Plan by increasing his monthly payment from \$150.00 to \$215.00 per month in order to complete the plan in 60 months.

9. The modification of the plan will permit the Plan to terminate on its original schedule of 60 months.

10. Modification of the plan will not prejudice the unsecured creditors, as they will receive the same dividend as contemplated by the Confirmed Plan.

**WHEREFORE**, the Debtor prays this Honorable Court for the following relief:

- A. Increasing his plan payment from \$150.00 to \$215.00, starting in October of 2015;
- B. For such other and further relief this Court deems just and proper.

Dated: August 25, 2015

Respectfully Submitted,

/s/ Charles L. Magerski  
Charles L. Magerski, Esq. #6297092  
Counsel for Debtors  
Sulaiman Law Group, LTD  
900 Jorie Blvd, Ste 150  
Oak Brook, IL 60523  
Phone (630)575-8181